

**REMARKS**

Reconsideration and allowance are respectfully requested.

Claims 3, 24 and 35-37 have been canceled. New claims 38-40 have been added. Thus, Claims 1-2, 4-19, 22 and 38-40 are now pending in this application.

Claims 1-19, 22, 24 and 35-37 were rejected under 35 U.S.C. 102(e) as being anticipated by Tso.

Applicants have amended claims 1 and 17 to recite the use of a plurality of rule objects operable to apply rules to a content object to prepare the content in a first way both for communication over an Internet channel to an Internet terminal and for publication by the Internet terminal connected to the Internet channel and prepare the content in a second way both for communication over a non-Internet channel to a non-Internet terminal and for publication by the non-Internet terminal connected to the non-Internet channel.

Tso teaches an intelligent caching server. This server is placed between the end user with a browser and an Internet website. If the server already has cached the content of the selected website, the content is retrieved from the cache and delivered to the end user's browser. However, if the cache does not have the content of the selected website, the content is retrieved over the Internet from the website by the caching server and presented to the end user's browser in a way specified by the user. Tso focuses on Internet communications and a Web browser delivery of content. A transcoding feature is provided by Tso to modify the content taken from the website prior to delivery to the end user.

A critical difference between the claimed invention and the teachings of Tso concerns the fact that Tso is an Internet centric system. By this it is meant that Tso focuses on content delivery over the Internet to an Internet Web user (devices that use a Web protocol, i.e., Internet

terminals and Internet channels). Thus, in Tso only an Internet-based (Web enabled) browser delivery system is provided for the content.

Claims 1 and 17 recite a) rule objects which prepare the content for communication over an Internet channel to (and for publication by) an Internet terminal; and b) rule objects which prepare the content for communication over a non-Internet channel to (and for publication by) a non-Internet terminal. Tso is clearly focused solely on operation a) as described above, and there is no teaching or suggestion for non-Internet content publishing activity as recited in operation b). Claims 1 and 17 accordingly are not anticipated by Tso. Additionally, there is no suggestion in Tso for any form of non-Internet-based content publishing, and thus claims 1 and 17 are patentable over Tso.

The claims which depend from claims 1 and 17 are asserted to be patentable over Tso for at least the same reasons as recited above with respect to claims 1 and 17.

Applicants further note dependent claim 19 wherein it is recited that the non-Internet channel is a newspaper print publication channel and the non-Internet terminal is a newspaper printer. There is no teaching or suggestion in Tso for this specific combination of Internet-based publication and additionally a non-Internet-based publication with rule objects addressing a newspaper print publication channel and a newspaper printer (terminal).

New claim 38 has been added. In claim 38, Applicants claim distribution channel rules which include a first Internet-based distribution channel rule and a second non-Internet-based distribution channel rule. Applicants further claim terminal rules which include a first Internet-based terminal rule and a second non-Internet-based terminal rule. As discussed above, Tso focuses solely on content delivery over the Internet to an Internet Web user (devices that use a Web protocol, i.e., Internet terminals and Internet channels). There is no teaching or suggestion

in Tso for additionally providing rules relating to **non-Internet-based distribution channels and non-Internet-based terminals**.

It is further noted that in claim 38 Applicants claim that the rule object includes a **content publisher selected** one of a plurality of **distribution channel rules** each specifying modifications to content objects so as to facilitate publication of the content over one of a plurality of different distribution channels and further includes a **content publisher selected** one of a plurality of **terminal rules** each specifying modifications to content objects so as to facilitate publication of the content by one of a plurality of different terminals. The reference to “content publisher selected” rules emphasizes that the claimed invention is focused on the publisher’s point of view, while Tso teaches a system that is focused on the end user’s point of view. In this regard, it is the end user in Tso who controls what content is provided and how that content may be manipulated and transformed. This is quite distinct from the claimed invention where it is the publisher who not only specifies the content object itself but also specifies selection of rules for publishing the content as to different distribution channels (i.e., publisher selected channel rules) and different terminals connected thereto (i.e., publisher selected terminal rules).

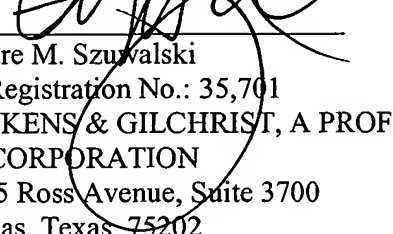
CUSTOMER NO. 23932

PATENT APPLICATION  
Docket No.: 45003-45USPT

In view of the foregoing, Applicants submit that the pending claims are patentable over the art as cited by the Examiner. Applicants accordingly submit that the pending application is in condition for allowance.

Dated: 11/20/16

Respectfully submitted,

By   
Andre M. Szurwalski  
Registration No.: 35,701  
JENKENS & GILCHRIST, A PROFESSIONAL  
CORPORATION  
1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202  
(214) 855-4500  
Attorneys For Applicant